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Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;

16 OTTOMOTTO LLC; OTTO TRUCKING

17 LLC,

18 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S MOTION
FOR RECONSIDERATION OF ORDER
GRANTING IN PART AND DENYING IN
PART ADMINISTRATIVE MOTION TO
FILE UNDER SEAL (DKT. 2237)**

19 the

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Plaintiff Waymo LLC's Motion for
7 Reconsideration of Order Granting in Part and Denying in Part Administrative Motion to File Under
8 Seal (Dkt. 2237) ("Motion for Reconsideration"). The Motion for Reconsideration seeks an order
9 sealing limited portions of exhibits for which the Court denied sealing.

10 3. The portions of Plaintiff's Responses and Objections to Ten Interrogatories Elected
11 Pursuant to Order Granting in Part Motion to Compel Interrogatory Responses, Dkt. 1173 (Nos. 26,
12 28, 29-34, 48-49) (previously filed as Exhibit 1 at Dkt. 1434-6) highlighted in green on pages 4-9, 25-
13 28, 32, 34-35, and 39-42 of the sealed version filed concurrently herewith as Exhibit A either
14 explicitly disclose Waymo's asserted trade secrets or detailed technical and supplier information from
15 which key aspects of the asserted trade secrets could be inferred. I understand that public disclosure
16 of these portions could destroy Waymo's asserted trade secrets. In addition, the portions highlighted
17 in green on pages 14, 24, and 45-46 of the sealed version filed concurrently herewith as Exhibit A
18 disclose detailed financial projections, compensation information, and valuation information. I
19 understand that public disclosure of such detailed financial information could enable Waymo's
20 competitors to unfairly tailor their investment and recruiting efforts based on Waymo's confidential
21 financial projections, compensation of its engineers, and valuations of the company as a whole, which
22 would cause Waymo significant competitive harm.

23 4. The portions of the August 18, 2017 30(b)(6) Deposition Transcript of Eric Meyhofer
24 (previously filed as Exhibit 2 at Dkt. 1374-6) marked in red boxes in the sealed version filed
25 concurrently herewith as Exhibit B (specifically, at deposition pages and lines 162:11,14-18; 163:1,4;
26 164:1; and 167:2-3,11-12) contain detailed technical and supplier information misappropriated by
27 Defendants and from which key aspects of at least Trade Secret Nos. 25 and 90 could be inferred. I
28

1 understand that public disclosure of these portions could destroy at least Waymo's Trade Secret Nos.
2 25 and 90.

3 5. The portions of Uber's compilation of deposition transcripts (previously filed as
4 Exhibit 3 at Dkt. 1374-8) marked in red boxes in the sealed version filed concurrently herewith as
5 Exhibit C¹ contain detailed technical and supplier information misappropriated by Defendants and
6 from which key aspects of at least Trade Secret Nos. 9, 14, 90, and 96 could be inferred. I understand
7 that public disclosure of these portions could destroy at least Waymo's Trade Secret Nos. 9, 14, 90,
8 and 96.

9 6. The portions of the July 26, 2017 Deposition Transcript of Jennifer Haroon (previously
10 filed as Exhibit 3 at Dkt. 1291-6) marked in red boxes in the sealed version filed concurrently
11 herewith as Exhibit D (specifically, at deposition pages and lines 210:13-14, 212:1-12, 212:21-25,
12 213:1, 213:5-14, 213:21-23) disclose detailed financial projections, compensation information, and
13 valuation information. I understand that public disclosure of such detailed financial information could
14 enable competitors to unfairly tailor their investment efforts based on Waymo's confidential financial
15 valuations of the company as a whole based on confidential competitive analyses, which would cause
16 Waymo significant competitive harm.

17 7. The portions of Anthony Levandowski's June 17, 2015 Project Chauffeur Bonus
18 Statement used as Deposition Exhibit 1085 (previously filed as Exhibit 9 at Dkt. 1278-17) marked in
19 red boxes in the sealed version filed concurrently herewith as Exhibit E contain financial
20 compensation details. I understand that public disclosure of such detailed financial information could
21 enable competitors to unfairly tailor their recruiting efforts based on Waymo's confidential
22 compensation of its engineers, which would cause Waymo significant competitive harm.

24 ¹ Specifically, at the following deposition pages and lines: 4/17 Boehmke at 35:4-5,17;
25 36:15,19; 40:1; 43:24-25; 8/4 Gruver at 250:1-4,6-9; 251:23-25; 359:6,12-15,24; 5/4 Haslim at
26 280:24-25; 4/14 Kshirsagar at 34:3; 35:18; 36:1; 6/14 Pennecot at 202:10; and 8/15 Schwarz at
27 179:5-7,11-16,23; 182:3,7,17; 183:2-5,12-13,19-22.

